

Hearing Date and Time: October 11, 2019 at 10:00 a.m. (EDT)

Heather M. Crockett
Deputy Attorney General
Justin Clouser
Deputy Attorney General
Indiana Office of the Attorney General
CURTIS T. HILL, JR.
Indiana Government Center South, 5th Floor
302 West Washington Street
Indianapolis, IN 46204-2770
Telephone: 317-233-6254

Attorneys for the State of Indiana

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

RETRIEVAL-MASTERS CREDITORS BUREAU, INC.¹,

DEBTOR.

CHAPTER 11

CASE NO. 19-23185 (RDD)

Dockets 52, 60, 67, 69, 72, 75

**STATE OF INDIANA’S NOTICE AND MOTION SCHEDULING HEARING ON
MOTION TO CONVERT TO CHAPTER 7, OR IN THE ALTERNATIVE,
APPOINT A CHAPTER 11 TRUSTEE**

Comes now the State of Indiana, by Indiana Attorney General Curtis T. Hill Jr., and Deputy Attorneys General Heather Crockett and Justin K. Clouser, and hereby does file its *Notice and Motion Scheduling Hearing on Motion to Convert to Chapter 7, or in the Alternative, Appoint a Chapter 11 Trustee*, and states that:

1. On July 10, 2019, the State of Indiana filed its Motion to Convert to Chapter 7, or in the Alternative, Appoint a Chapter 11 Trustee (the “Motion to Convert”). [Dkt. 52]

2. On July 12, 2019, the State of Indiana filed Statements in Support of its Motion to Convert with supporting letters from the Attorneys General of: Tennessee, Ohio, Washington, Michigan, Connecticut, Nevada and Texas. [Dkt. 60]

¹ The last four digits of the Debtor’s taxpayer identification number is 9495. The location of the Debtor’s service address for purposes of this chapter 11 case is 4 Westchester Plaza, Suite 110, Elmsford, NY 10523. The Debtor also does business as American Medical Collection Agency.

3. On July 15, 2019, Optum360, LLC filed its Joinder to the Motion to Convert. [Dkt. 67]

4. On July 15, 2019, the State of Indiana filed Supplemental Statements in Support of its Motion to Convert with supporting letters from the Attorneys General of: New York and Kansas. [Dkt. 69]

5. On July 15, 2019, Quest Diagnostics Incorporated filed its Joinder to the Motion to Convert. [Dkt. 72]

6. On July 16, 2019, the State of Indiana filed a Second Supplemental Statement to the Motion to Convert with a supporting letter from the Attorney General of Kentucky. [Dkt. 75]

7. No objection to the Motion to Convert has been filed to the State of Indiana's knowledge.

WHEREFORE, the State of Indiana requests that its Motion to Convert be heard at the Omnibus Hearing currently scheduled for **October 11, 2019 at 10:00 a.m. (EDT)** and for all other relief just and proper in the premises.

Respectfully submitted,
CURTIS T. HILL, JR.
Attorney General of Indiana
Atty. No. 13999-20

By: /s/ Heather M. Crockett
Heather M. Crockett, Atty. No. 26325-22
Deputy Attorney General
Justin K. Clouser, Atty. No. 30301-80
Deputy Attorney General
Office of Attorney General
Indiana Government Center South, 5th Floor
302 West Washington Street
Indianapolis, IN 46204-2770
Telephone: 317-233-6254
Facsimile: 317-232-7979
Email: Heather.Crockett@atg.in.gov
Email: Justin.Clouser@atg.in.gov

CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing *State Of Indiana's Motion Scheduling Hearing on Motion to Convert to Chapter 7, or in the Alternative, Appoint a Chapter 11 Trustee* has been duly served upon all counsel of record listed below, by ECF notification on August 16, 2019:

- Jordan Adler jordan.adler@ag.ny.gov
- John Douglas Beck john.beck@hoganlovells.com, ronald.cappiello@hoganlovells.com
- Jessica Boelter jboelter@sidley.com,
mlinder@sidley.com;emcdonnell@sidley.com;jessica-boelter-1416@ecf.pacerpro.com
- Cleveland Roswell Burke cleveland.burke@wallerlaw.com,
tammy.greenblum@wallerlaw.com
- Marvin E. Clements agbanknewyork@ag.tn.gov
- Justin Clouser justin.clouser@atg.in.gov
- Heather M Crockett heather.crockett@atg.in.gov
- Matthew C. De Re matt@attorneyzim.com
- Christopher R. Donoho chris.donoho@hoganlovells.com
- Derek W. Edwards derek.edwards@wallerlaw.com,
Nancy.easterling@wallerlaw.com;tapdocketingclerk-nash@wallerlaw.com
- William Hao william.hao@alston.com, leslie.salcedo@alston.com
- Serene K. Nakano serene.nakano@usdoj.gov
- Nicholas A. Pasalides npasalides@reichpc.com
- Abigail Ryan abigail.ryan@oag.texas.gov
- Michelle E. Shriro mshriro@singerlevick.com, scotton@singerlevick.com
- William S. Sugden will.sugden@alston.com
- United States Trustee USTPRegion02.NYECF@USDOJ.GOV
- Steven Wilamowsky wilamowsky@chapman.com
- Keith Wofford keith.wofford@ropesgray.com,
ssally@ropesgray.com;nova.alindogan@ropesgray.com;roy.dixon@ropesgray.com;danie
l.egan@ropesgray.com
- Tom Zimmerman tom@attorneyzim.com, firm@attorneyzim.com

By: /s/ Heather M. Crockett
Heather M. Crockett
Deputy Attorney General
Justin K. Clouser
Deputy Attorney General